

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN - MILWAUKEE DIVISION

---

JOHN DOE,

Plaintiff,

v.

Case No. 2:19-cv-00388-JPS

MARIAN UNIVERSITY,

Defendant.

---

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

---

NOW COMES the Defendant, Marian University, by its attorneys, Axley Brynelson, LLP, by Attorneys Lori M. Lubinsky and Danielle Baudhuin Tierney, and hereby moves the Court pursuant to Federal Rule of Civil Procedure 56, for summary judgment in favor of Defendant. This Motion for Summary Judgment is supported by the accompanying Brief in Support of Defendant's Motion for Summary Judgment, Defendant's Proposed Findings of Fact, supporting declarations, and the pleadings of record.

Dated this 15<sup>th</sup> day of October, 2019.

*s/ Danielle Baudhuin Tierney*  
Lori M. Lubinsky, SBN: 1027575  
Danielle Baudhuin Tierney, SBN:1096371  
Attorneys for Defendant  
Marian University  
AXLEY BRYNELSON, LLP  
Post Office Box 1767  
Madison, WI 53701-1767  
Telephone: (608) 257-5661  
Email: llubinsky@axley.com  
dtierney@axley.com